

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN
MADISON DIVISION

JOAN LOCH, Individually and on behalf of all others similarly situated	§	Civil Action No. 3:2022-cv-00213
	§	JURY TRIAL DEMANDED
<i>Plaintiff,</i>	§	
v.	§	
AMERICAN FAMILY MUTUAL INSURANCE COMPANY, S.I.	§	COLLECTIVE ACTION PURSUANT TO 29 U.S.C. §216(b)
	§	
	§	CLASS ACTION PURSUANT TO FED. R. CIV. P. 23
<i>Defendant.</i>	§	

JOINT MOTION TO EXTEND DISPOSITIVE MOTIONS DEADLINES

Plaintiff Joan Loch, individually and on behalf of all Putative Collective/Class Members (“Plaintiff”) and Defendant American Family Mutual Insurance Company, S.I. (“Defendant”) (collectively the “Parties”), hereby file this Joint Motion to Extend the Current Deadlines, in accordance with this Court’s Scheduling Order, ECF No. 27. Currently the deadline to decertify any conditionally certified class and the deadline to move for Rule 23 class certification is February 17, 2023. *Id.* Further, the deadline to file dispositive motions is October 6, 2023. *Id.* The deadline to complete discovery is March 15, 2024. Currently, Plaintiff’s Motion for Conditional Certification (the “Motion”) is pending. ECF No. 19. As the scope of the current case is not yet known, the Parties respectfully request that the Court extend the deadline to decertify any conditionally certified class and the deadline to move for Rule 23 certification to June 30, 2023, and the deadline to file dispositive motions to January 29, 2024, to allow the parties a reasonable time for discovery following rulings on potential motions relating to certification or decertification.

WHEREFORE, the Parties respectfully requests that the Court grant this Joint Motion to Extend Dispositive Motions Deadlines and extend the deadline to decertify any conditionally certified

class and the deadline to move for Rule 23 certification to June 30, 2023, and the deadline to file dispositive motions to January 29, 2024.

Date: February 17, 2023

Respectfully submitted,

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Date: February 17, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2023, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Western District of Wisconsin, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Clif Alexander
Clif Alexander